

Andrew Roman Perrong, OSB No. 243320
 a@perronglaw.com
 Perrong Law LLC
 2657 Mount Carmel Avenue
 Glenside, PA 19038
 215-225-5529
 Attorney for Plaintiff and the Proposed Class

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF OREGON
 PORTLAND DIVISION**

JESSICA MURCH, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

and

**ISRAEL BASAN CONSULTING, INC.
 D/B/A NEARME ROOFING**

Defendants.

Case No.
 3:25-cv-64

MOTION FOR EXTENSION OF TIME
 TO COMPLETE DISCOVERY
 TCPA (47 U.S.C. § 227)
 DEMAND FOR JURY TRIAL

MOTION FOR EXTENSION OF TIME TO COMPLETE DISCOVERY

The Plaintiff has brought this action under the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227, a federal statute enacted in response to widespread public outrage about the proliferation of intrusive, nuisance telemarketing practices. (Compl. ¶ 1); *Mims v. Arrow Fin. Servs., LLC*, 132 S. Ct. 740, 745 (2012). The Amended Complaint alleges that Keystone Remodeling, Inc. (“Keystone”), commissioned illegal calls to Plaintiff and other putative class members, through calls placed by co-Defendant Israel Basan Consulting, Inc. without their consent. Both Keystone and Israel Basan nevertheless have failed to respond to, plead, or otherwise defend this complaint. Accordingly, Keystone’s default was entered and Israel’s default is pending. This Court previously set a discovery deadline of July 10, 2025, to

conduct class discovery as to the then-Defaulting Defendant, Keystone, and until August 10 to move for class certification or default judgment.

However, in the interim period, based on the discovery conducted, an Amended Complaint was filed and Defendant Israel Basan Consulting added to the litigation. The amended complaint explains that Defendant Keystone hired defendant Israel Basan to conduct the telemarketing at issue on its behalf, rendering Israel Basan directly liable for the calling conduct alleged. The discovery in this matter has uncovered class-wide calling records with respect to Israel Basan's calling and marketing conduct. However, an additional 30 days is necessary to completely analyze the data and records, follow up with the telephone company producing them, analyzing them for any deficiencies, and ultimately to draft a class certification motion. The Plaintiff apologizes to the Court for the delay in seeking this extension after the time to file for class certification or a default judgment was ordered by the court and had anticipated asking the Court to revise the schedule based on the Amended Complaint, but Defendant Israel Basan's default and issues with obtaining the telephone company records caused a calendaring error that erroneously re-calendared the applicable deadlines from the date of the filing of the Amended Complaint on Counsel's calendar without the corresponding filing of a motion.

Wherefore, for the foregoing reasons, the Plaintiff respectfully requests that the court grant her until September 17, 2025 within which to file a motion for class certification and ultimately default judgment.

Dated: August 17, 2025

/s/ Andrew Roman Perrong
 Andrew Roman Perrong, OSB No. 243320
 a@perronglaw.com
 Perrong Law LLC
 2657 Mount Carmel Avenue
 Glenside, PA 19038

215-225-5529
Lead Attorney for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I certify that I filed the foregoing via ECF on the below date.

I further certify that I mailed a copy of the foregoing to:

Keystone Remodeling, Inc.
2018 156th Avenue Northeast, Suite 128
Bellevue, WA 98007

and

Israel Basan Consulting, Inc.
16915 NE 22ND PL
BELLEVUE, WA, 98008

Dated: August 17, 2025

/s/ Andrew Roman Perrong
Andrew Roman Perrong, OSB No. 243320
a@perronglaw.com
Perrong Law LLC
2657 Mount Carmel Avenue
Glenside, PA 19038
215-225-5529
Lead Attorney for Plaintiff and the Proposed Class